

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

**PORT HAMILTON REFINING &
TRANSPORTATION, LLLP,**

PLAINTIFF,

VS.

**NATIONAL INDUSTRIAL SERVICES,
LLC**

DEFENDANT.

CASE NO. 1:24-cv-00023

**ACTION FOR TEMPORARY RESTRAINING
ORDER, PRELIMINARY INJUNCTION, AND
PERMANENT INJUNCTION**

**RESPONSE TO MOTION FOR *PRO HAC VICE*
ADMISSION OF RORY DIAMOND**

Plaintiff, Port Hamilton Refining & Transportation, LLLP (“Port Hamilton”), responds to the motion (Doc. No. 5) for *pro hac vice* admission of Rory Diamond.

While Port Hamilton takes no position on the motion, it wishes to call to the Court’s attention the following:

1. Attorney Diamond’s *pro hac vice* application, made subject to the penalties of perjury, inaccurately affirms that he has never been suspended from practice. The Certificate of Standing from the State Bar of California (Doc. No. 5-2 at p.2) indicates that he was briefly suspended from the practice of law in California in 2018.
2. Attorney D’Amour’s affirmation does not conform with the requirements of an affirmation in that it is not made subject to the penalties of perjury. *See* 28 U.S.C.

§ 1746(2).

Respectfully submitted,

ANDREW C. SIMPSON, P.C.,
Counsel for Port Hamilton Refining &
Transportation, LLLP

Dated: September 20, 2024

/s/ Andrew C. Simpson
By: Andrew C. Simpson, Esq.
VI Bar No. 451
ANDREW C. SIMPSON, P.C.
2191 Church Street, Suite 5
Christiansted, VI 00820
Tel: 340.719.3900
asimpson@coralbrief.com